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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Elimination or Revision of Certain) CC Docket No. 93-5
Reporting Requirements under Part)
43 of the Commission's Rules,)
Reports of Communications Common)
Carriers and Certain Affiliates)

COMMENTS OF BELL SOUTH

BellSouth Telecommunications, Inc. ("BellSouth") hereby comments in response to the Notice of Proposed Rulemaking ("NPRM"), FCC 93-18, released February 2, 1993. The NPRM proposes to eliminate Section 43.42 of the Commission's Rules, which requires certain carriers to file copies of their pension and benefit plans with the Commission and to report on the funding, accounting and changes in the plans.

BellSouth concurs with the Commission's tentative conclusion that Section 43.42 of the Rules should be repealed. There have been significant changes in the pension and benefits areas that make close Commission scrutiny of carrier plans unnecessary. As noted in the NPRM, since 1985 the Financial Accounting Standards Board has adopted three standards governing accounting for pension and benefit costs. These changes in Generally Accepted Accounting Principles ("GAAP") will insure more uniform accounting for pension and benefit costs than was the case when Section 43.42 was adopted in 1963. This increased uniformity should reduce the need for direct Commission

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oversight of the pension and benefit plans of carriers.

In addition to GAAP changes, in 1974 Congress passed the Employment Retirement Income Securities Act ("ERISA"), which establishes standards of conduct for pension and welfare benefit plans. ERISA's requirements are enforced jointly by the Internal Revenue Service and the Department of Labor. There is no need for the Commission to duplicate the oversight provided by the IRS and the DOL. In light of the adoption of specific GAAP and ERISA requirements for pension and benefit plans, BellSouth agrees that Section 43.42 of the Commission's Rules is unnecessary, and should be repealed.

After the repeal of Section 43.42, the Commission will continue to receive information sufficient to monitor carrier pension data through ARMIS Report 43-02, Table VIII, Pension Costs. This data, coupled with the Commission's ability to request more data from carriers as needed, will provide the Commission with sufficient information to perform its oversight responsibilities under the Communications Act.

BellSouth also concurs with the proposal in the NPRM to make the Form 10-K reporting threshold under Section 43-21(c) the same as the threshold for other reports required by Section 43 of the Commission's Rules. A reporting threshold of at least \$100 million will relieve the Commission and small reporting companies of filings that are

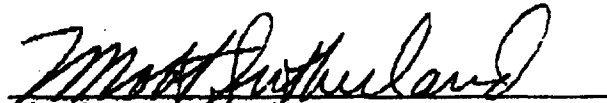
not needed by the Commission. BellSouth would have no objection to a higher reporting threshold, say \$500 million, for all of the reports required by Part 43 of the Commission's Rules.

BellSouth commends the Commission for its efforts to review existing reporting requirements and to eliminate any requirements that no longer meet a current regulatory need. The resulting administrative savings will benefit the Commission, the carriers and the public at large.

Respectfully submitted,

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